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April 4, 2024

**VIA ECF**

Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Faustina Haynes v. City of New York, et al., 19 Civ. 11008 (PGG)(JW)

Your Honor:

I am a Senior Counsel in the New York City Law Department, attorney for defendants City of New York, David Hansell, Jill Krauss, Melissa Hester, and Tia Waddy in the above-referenced matter. I write to respectfully request a 30-day extension, from April 9, 2024 to May 9, 2024, for the parties to file any objections to the Report and Recommendation by Magistrate Judge Jennifer E. Willis as to defendants' motion for summary judgment, which was issued on March 26, 2024. This is defendants' first request for an extension of time to file any objections to the Report and Recommendation. Plaintiff consents only to a 14-day extension. The reason for plaintiff's position is "due to age of the case and how long the motion has been pending plus the fact that an additional 14 days should be more than enough to file objections."

The reason defendants are requesting a 30-day extension is that I just took this case over on April 1, 2024. Magistrate Judge Willis' Report and Recommendation is 46 pages long and sets forth a detailed analysis of the record developed in discovery, which was extensive. The requested 30-day extension is necessary for me to thoroughly digest the Report and Recommendation, review the summary judgment motion papers, and familiarize myself with the discovery record to determine if defendants will interpose any objections. Furthermore, the additional 30 days will permit defendants sufficient time to draft any objects they determine are appropriate. I will also be out of the office on a previously scheduled vacation from April 11 through April 15. I accordingly respectfully request a 30-day extension for all parties to file any objections to the Report and Recommendation.

I thank the Court for its time and consideration of this request.

Respectfully submitted,

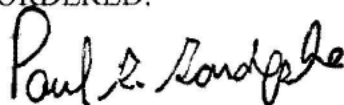
/s/ *Christopher G. Arko*

Christopher G. Arko  
Senior Counsel

cc: Samuel O. Maduegbuna, Esq. (via ECF)  
*Attorney for plaintiff*

**MEMO ENDORSED:** The application is granted.  
The parties' objections to Judge Willis's Report and  
Recommendation are due by **May 9, 2024**.

SO ORDERED.



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Paul G. Gardephe  
United States District Judge

Date: April 5, 2024